



In partnership with:

The US-Afghan Reconstruction Council/Global-ARO Mountain Pastures Dairy Company - Afghanistan

USAID Cooperative Agreement No: 306-A-00-04-00545-00

MOUNTAIN PASTURES DAIRY PLANT ENVIRONMENTAL ASSESSMENT

Submitted to

Abdul Saboor Mia Cognizant Technical Officer USAID Afghanistan Kabul, Afghanistan

Submitted by

Land O'Lakes, Inc. P.O. Box 64281 St. Paul, MN 55164-0281 U.S.A.

July 2006

DAIRY INDUSTRY REVITALIZATION PROJECT FOR AFGHANISTAN

USAID CA# 306-A-00-04-00545-00

MOUNTAIN PASTURES DAIRY PLANT ENVIRONMENTAL ASSESSMENT

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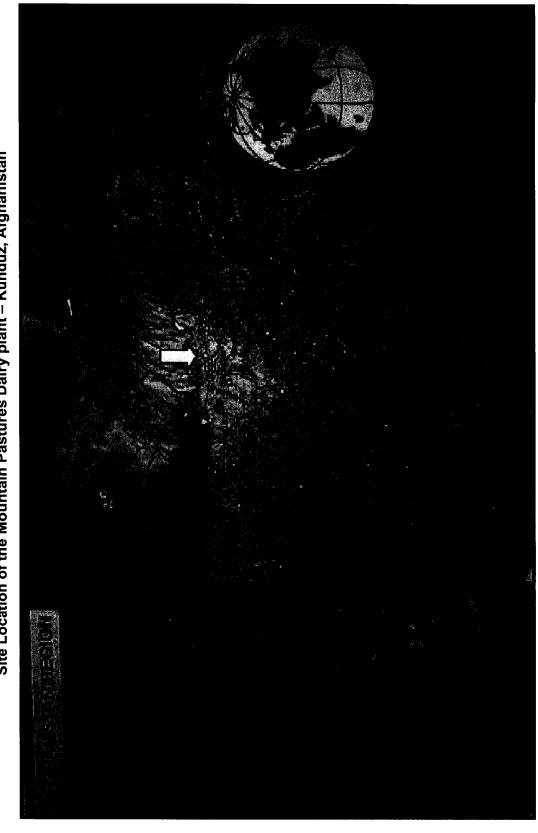


Plate No. 1 Site Location of the Mountain Pastures Dairy plant – Kunduz, Afghanistan

1. PURPOSE OF AND NEED FOR ACTION

- **1.1 Proposed Action**: The Mountain Pastures Dairy Company (MPDC) proposes to build a commercial dairy processing plant within the Abbdan Desert approximately twelve (12) kilometers north of the city of Kunduz in Kunduz Province, Afghanistan (see plate #1).
- **1.2 Purpose and Need of Action**: The purpose of the proposed action is to provide a facility to produce pasteurized dairy products, pure bottled water, and flavored juice products and to make them available on a large scale to Afghan citizens in a sanitary and controlled environment. The need for such products is great, as currently there are only a handful of small pasteurization facilities in Afghanistan at this time.
- **1.3 Project Objectives:** Multiple direct and indirect objectives of this project have been identified:
- 1.3.1 Build and equip a state-of-the-art facility that will efficiently produce safe and sanitary marketable products for human consumption in a cost-effective manner (Plate 2).
- 1.3.2 Construct and operate the plant in a manner that avoids, minimizes or mitigates environmental damage; employs internal systems that reduce energy consumption; treat and minimize waste stream impacts and institutes recycling and reuse of waste products in a safe manner.
- 1.3.3 Provide a dietary alternative to the population as a whole and specifically provide wholesome products to those at risk: the young, the infirm and women of childbearing age.
- 1.3.4 Increase general population health as a result of the availability of pasteurized milk and potable water supplies.
- 1.3.5 Afford work opportunity for the local labor force.
- 1.3.6 Establish the infrastructure for milk production at the individual land-owner level and subsequently set in motion the development of a raw milk collection system.
- **1.4 Decision Options:** This Environmental Assessment will determine whether there will be no action, an alternate location, or as proposed.

1.5 Scoping

1.5.1 Several parties participated in the planning for this environmental assessment including The Afghan National Environmental Protection Agency, The US-Afghan Reconstruction Council/Global-ARO, the Mountain Pastures Dairy Company and Land O'Lakes Afghanistan.

- 1.5.2 The Ministry of Energy and Water, The Ministry of Mines and Industry, The Ministry of Information and Culture, The Ministry of Agriculture and Animal Husbandry, and The Ministry of Public Health provided information resources and assistance with coordination.
- 1.5.3 The Biology and Geology Departments of the University of Kabul provided expertise and salient data points for the environmental evaluation of the dairy plant site.
- 1.5.4 A Scoping Statement was submitted to Saboor Mia, Cognizant Technical Officer, USAID Afghanistan in May 2006. The scoping document was approved the following month.

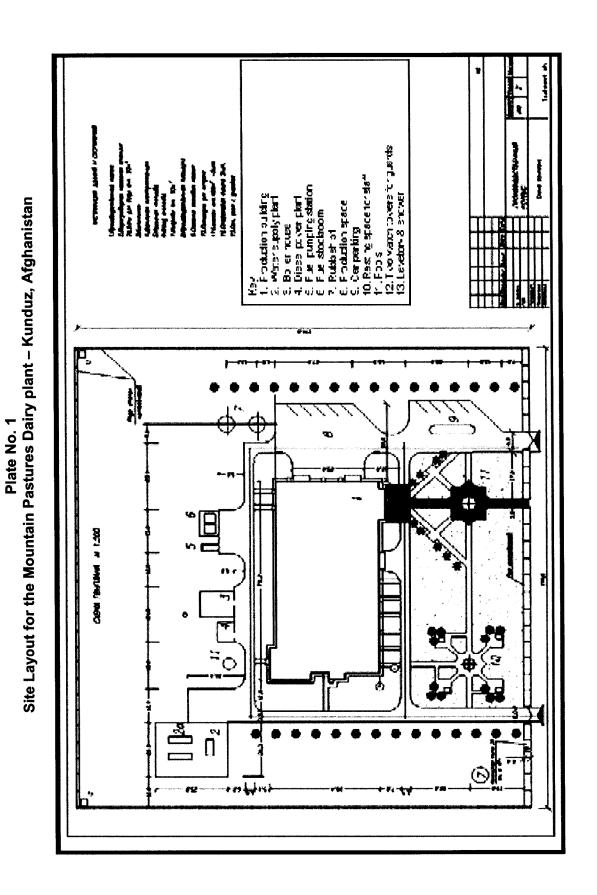
1.6 Relevant Resources

- 1.6.1 Biological Resources: There were no threatened or endangered species (plant, animal or insect) noted in the area of the plant site.
- 1.6.2 Aquatic Resources: The Kunduz River is located approximately 3.5 km south of the plant site. Dry waterways are located to the east of the site. The Kunduz River will not be affected directly or indirectly by plant construction or operation. The dry waterways flow only during rain periods, and will not be impaired by building construction nor will runoff be impacted by plant operation.
- 1.6.3 Cultural Resources: The plant location is more than 500 meters from the Tourist Hills referred to in the letter from the Ministry of Culture and Information, and this is well beyond the minimum setback distance of 100 meters as mentioned in the letter. The plant location will not significantly impact the view or the esthetics of the area as stated in a letter from the Kunduz Provincial Director of the Ministry of Information, Culture and Tourism (Appendix A). Further, the immediate plant location will not impact any known archeological, cultural or religious site(s).

1.7 Permits

- 1.7.1 Permission was granted to Mountain Pastures Dairy Company for a 5 year land lease (with option for extension) from the Afghan Government in a letter from the Kunduz Provincial Governor's office, dated 27 August 2005. The Department of Agriculture, Livestock and Foodstuff of Kunduz Province Afghanistan Investment Support Agency agreed to and permitted the land lease, water use and construction/operation of a processing plant for the production of dairy, water and juice products.
- 1.7.2 Other clearances regarding water usage, waste treatment and recycling have been coordinated with relevant departments and ministries at both the provincial and national levels.

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2. ALTERNATIVES INCLUDING PROPOSED ACTIONS

- **2.1 Formulation:** This chapter describes the alternatives and compares the alternatives in terms of their environmental impacts and achievement of project objectives. The alternatives formulated during the pre-scoping process are defined and summarized in Section 2.2.
- 2.1.1 The alternatives were reexamined in preparation of the Environmental Assessment to verify that they met the project objectives of reducing health risks, and establishing a dependable market and milk collection network for the local milk cow owners in the region. Environmental impacts to endangered plant, animal (including avian) and insect species were considered in the analysis of alternatives, as was air quality. Considerations of surface and groundwater impacts were also a part of the analysis. Economics were given due consideration in the selection of the preferred alternative.
- 2.1.2 Locating the processing plant at a distant location for pasteurization was never considered as a reasonable alternative to address the project objectives due to the need for the raw milk to be delivered in a timely manner to the processing point.
- **2.2 Alternatives:** The alternatives are described in the following paragraphs and summarized in Table 1. The two action alternatives are similar. Both address the needs of the project and both have similar impacts; however, the proposed site better suits transportation, power and land requirement issues.
- 2.2.1 Alternative A: <u>No Action</u>: Under the no action alternative, the following conditions would occur:
 - 2.2.1.1 Past Actions: There have been no past actions in Kunduz or neighboring provinces.
 - 2.2.1.2 Current Actions: No current actions are being taken to provide pasteurized milk products in Kunduz or neighboring Provinces.
 - 2.2.1.3 Future Actions: There are no known actions by others to provide processed milk, water or juice products in Kunduz or neighboring Provinces.
- 2.2.2 Alternative B: <u>Preferred Alternative</u>: This alternative would provide for the construction of a state-of-the-art dairy processing plant capable of processing milk, water and flavored juices. The following actions and conditions would occur:
 - 2.2.2.1 The plant would be constructed on approximately three hectares (1.2 acres) of land.

- 2.2.2.2 The plant would use approximately 80m³ of water per day taken from an underground aquifer utilizing two submersible pumps from wells drilled on the plant site.
- 2.2.2.3 The plant would have the capacity to produce approximately 800kw per hour using two diesel-powered electrical generators on site (when in use).
- 2.2.2.4 The plant would generate both solid and liquid waste streams.
- 2.2.3 Alternative C: <u>Alternative Location</u>: Alternative C follows the impacts of the preferred alternative (Alternative B, above). The differences between alternatives B and C regarding other considerations (land, transportation and socioeconomics) will be discussed in Section 3 and is presented in Table 1.

Summary and Comparison of Alternatives

Table No. 1

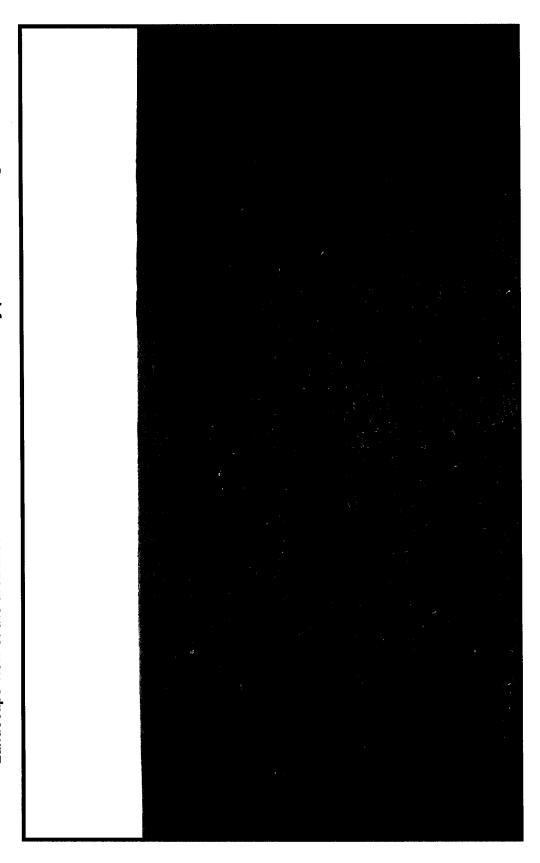
Meets Objectives Potential impacts Yes å road building. Power transmission lines are in place at Transport Impact site will not require and from the plant No impact. Transportation to Potential impacts development or site location. additional None nutrition impact due to non-availability Negative health & health & nutrition Positive human health & impact. Positive human Health Impact of processed products. impact. individual dairy cow potential, Increased potential. Increased cultural, religious or individual dairy cow cultural, religious or individual dairy cow archeological impacts. <u>Increased</u> family income for Potential cultural, family income for market potential, Reduced family Social Impact archeological impacts. Increased job archeological owners. No Reduced job owners. No religious or income for job market mpacts. owners. Resource Impact No significant impact to natural Potential impacts. resources. None **Acres Disturbed** 1.2 acres (public land) 1.2 acres None Alternative Location **Alternative** Alternative) No Action (Preferred Kunduz Site

Mountain Pastures Dairy - Environmental Assessment

3. AFFECTED ENVIRONMENT

- 3.1 General Description: The existing environment affected by this project includes both natural and man-made features. The plant site is located on a desert plateau 3.5 km north of the Kunduz River in Kunduz Province, Afghanistan. Elevation above mean sea level of the plant site is approximately 433 meters (1420 feet) at latitude 36 degrees, 50 minutes, 17.77 seconds east and longitude 68 degrees, 51 minutes, 21.26 seconds, north. The site is adjacent to an exiting highway and overhead high-voltage commercial electrical lines. The area has been cleared of land mines, thus it has been disturbed to some extent. The adjacent (as far as the eye can see) plateau is devoid of villages, settlements, or any other discernable development. It is a dry environment and sparse in vegetation and insect/animal life (Plate 3).
- **3.2. Biological Resources:** Threatened and Endangered Species: Afghanistan is a signatory and party to an international agreement regarding endangered species and is thus obliged to address threatened or endangered species that may be impacted by any proposed action. U. S. Code of Federal Regulations #22, §216.5 specifically addresses endangered species. A bio-survey was accomplished recording plant, animal, avian and insect species at the plant site.
- **3.3 Aquatic Resources:** There are no surface water resources located at or near the plant site. The Kunduz River is located 3km from the site. An underground aquifer is located beneath the plant site.
- **3.4 Cultural Resources:** There are no known cultural resources (historical, religious or archeological) present on the plant site.
- 3.5 Wetland Resources: There are no classified wetlands at the site.
- **3.6 Terrestrial Resources:** The desert site revealed eleven plant species, one bird, twelve insects and no animals or aquatic species.
- **3.7 Air Quality:** With the exception of fugitive dust occurring naturally during wind storms, the air quality existing at the site is within standards.
- **3.8 Aesthetics:** The Tourist Hills, referenced in the letter from the Ministry of Culture and Tourism, are located within sight of the plant location.
- **3.9 Socio-economic Description:** The project lies within Kunduz Province, about twelve (12) kilometers north of the city of Kunduz. Kunduz is the largest city in the province and is commercially active. Rural activity is comprised of wheat and rice farming, with other activities leading to the production of other agricultural products. Sheep and goat herders graze selected hills and valleys in the province. Many farm families own one to four cows, some chickens and other livestock. The rural population is primarily subsistence-based and the province includes a large number of unemployed people. The closest village is four (4) kilometers from the plant site.

Landscape view of the area around the Mountain Pastures Dairy plant – Kunduz, Afghanistan Plate No 3.



Mountain Pastures Dairy - Environmental Assessment

3.10 Developed Resources: The plant site is located adjacent to a paved road running north and south. High-voltage power lines pass by the plant. These are the only developed resources in close proximity to the plant.

4. ENVIRONMENTAL CONSEQUENCES

4.1 Introduction: This chapter is organized by resource topics, with the impacts of all alternatives combined under resource headings. Note Table 2 for comparison of environmental impacts.

4.2 Resource Impacts

- 4.2.1 Biological Resources:
 - 4.2.1.1 Alternative A: No Action: No Impact.
 - 4.2.1.2 Alternative B: Preferred Action: **Insignificant Impact.** Three hectares of habitat loss. Survey of the site for threatened and endangered species revealed no life forms that fall into either of these categories.
 - 4.2.1.3 Alternative C: Alternate Location: **Potential impact** to threatened or endangered species exists.
- 4.2.2 Aquatic Resources:
 - 4.2.2.1 Alternative A: No Action: No Impact.
 - 4.2.2.2 Alternative B: Preferred Action: Insignificant Impact. There is no impact to surface water resources. However, water will be pumped from the aquifer located beneath the plant site at the peak rate of 80m³ per day. Two wells have been drilled to a depth of 88 meters. They are cased and sealed to prevent contamination. Water was found at 58 meters depth. The aquifer has been identified to be a rechargeable water source and will easily support the small amount of water withdrawn for product processing. The plant will generate liquid and sludge waste streams. The liquid waste material will be treated on site producing effluents that will be of a quality that can be used for land application (irrigation) and livestock use. The small amount of sludge produced will be treated to a level that can be safely used for land application as a fertilizer. Well drilling records indicate that the soil is clay to approximately the 58 meter depth, and characterized by sand below that depth. A root zone (10cm depth) soil sample was obtained and classified using a standard Munsel Soil Color Chart [10YR/5/2] (see plate #4). Additionally, a soil profile was documented (see plate #5). Soils found at the site will filter any land application of treated effluent prior to recharging the aquifer.
 - 4.2.2.3 Alternative C: Alternate location: **Potential Impact** to surface and underground water resources.
- 4.2.3 Cultural Resources:
 - 4.2.3.1 Alternative A: No Action: No Impact.

- 4.2.3.2 Alternative B: Preferred Action: **No Impact.** The site location has been surveyed by the Kunduz Provincial Ministry of Information and Culture. There were no cultural, religious or archeological sites of record that will be directly or indirectly impacted by the dairy plant construction or operation (see appendix A).
- 4.2.3.3 Alternative C: Alternate Location: Potential Impact to cultural sites.

4.2.4 Wetlands:

- 4.2.4.1 Alternative A: No action: No Impact.
- 4.2.4.2 Alternative B: Preferred Action: **No Impact.** A site survey was conducted and there were no wetlands present at or near the plant site.
- 4.2.4.3 Alternative C: Alternate Location: Potential Impact.

4.2.5 Terrestrial Resources:

- 4.2.5.1 Alternative A: No Action: No Impact.
- 4.2.5.2 Alternative B: Preferred Action: **Insignificant Impact.** There will be no indirect impact to terrestrial resources. Direct impacts will be contained to the three hectare footprint of the plant site. There is sparse plant life and the action will insignificantly impact the desert floor.
- 4.2.5.3 Alternative C: Alternate Location: Potential Impact.

Plate No. 4

Determining the soil type of the Mountain Pastures Dairy plant site



4.2.6 Air Quality:

- 4.2.6.1 Alternative A: No Action: No Impact.
- 4.2.6.2 Alternative B: Preferred Alternative: **Insignificant Impact.** The plant will have two 400kw diesel powered electrical generators. The equipment is designed to emit minimum particulate matter. There is no anticipated significant impact to air quality.
- 4.2.6.3 Alternative C: Alternate Location: **Insignificant Impact.** It is assumed that the alternate sited plant would employ the same generator equipment.

4.2.7 Aesthetics:

- 4.2.7.1 Alternative A: No Action: No Impact.
- 4.2.7.2 Alternative B: Preferred Action: **Insignificant Impact.** The Tourist Hills referenced in the letter from the Ministry of Information, Culture and Tourism are located within sight of the plant. The Kunduz Province Director of the Ministry of Information, Culture and Tourism performed a site visit and determined that the plant will not impact the view of the hills due to the distance (over 500 meters) from the area and the low profile of the plant construction (Appendix A). The low profile of the plant minimally impacts the landscape as a whole, and the wall on three sides of the plant compound are designed to blend with desert colors. The majority of solid waste will be recycled and reused. Solid material that can not be reclaimed will be contracted for disposal off-site at an approved incinerator.
- 4.2.7.3 Alternative C: Alternate Location: Potential Impact.
- 4.2.8 Socio-Economic Resources: The selection of location for a dairy plant that will operate efficiently and economically is dependent upon the convergence of; available land, water resources, transportation, power, available work force, nearby dairy cows and sound governing officials.
 - 4.2.8.1 Alternative A: No Action: **Significant Impact.** The absence of the proposed activity would *negatively* impact the opportunities for laborers and local farmers to engage in economically productive work and sale of raw dairy products. Continued *negative* health impacts would result from the lack of an additional source of processed dairy, water and juice products.
 - 4.2.8.2 Alternative B: Preferred Action: **Positive Significant Impact.** The direct impact of the plant construction is the employment of construction workers and work opportunities for plant laborers once the plant is in operation. Positive indirect impacts are passed on to the small farmers and dairy cow owners, as well as the transportation sector. Further positive indirect impacts are passed on to the general population in the form of dairy, water and juice products that meet sanitary standards, thus providing a better health basis for individuals *at risk*.

The improved economy and employment opportunities of the province and the nearby rural communities will aid in the overall social fabric of the area. The site selection utilizes government-owned land and does not impact individual land owners nor does it remove land from crop or grazing production.

4.2.8.3 Alternative C: Alternate Location: **Potential Positive Significant Impact**. Depending on the location, alternative C could provide similar positive impacts to socio-economic categories; or if located in an already economically established area, alternative C could have a lesser impact. If land were required to be used that belonged to individual land-owners, there is often the issue of "takings". In the present climate of rebuilding, it is important that land-owners maintain title to their land. An added issue includes the lost or missing proof of land ownership which, in the case of purchase or lease, could lead to disputes and unrest.

4.2.9 Developed Resources:

- 4.2.9.1 Alternative A: No Action: No Impact.
- 4.2.9.2 Alternative B: Preferred Action: **No Impact.** The existing highway and power lines are not impaired or impacted by the plant site. The road is not heavily used. The increased traffic at the plant entrance should not interfere with traffic flow. The intersection of the plant entrance and the highway provides a margin of safety with clear view in both directions of traffic flow. The plant, as designed, will not interfere with the overhead power lines.
- 4.2.9.3 Alternative C: Alternate Location: Potential Impact.

Plate No. 5

The soil profile of the area around the Mountain Pastures Dairy plant site



Dairy Industry Revitalization Project for Afghanistan

TABLE 2
Comparison of Alternatives and Associated Impacts

Socio-Econ	No Impact Neg Impact	Pstv. Impact	Pot Neg Imp
Air Quality Aesthetics Socio-Econ	No Impact	Min. Impact	Pot. Impact
Air Quality	No Impact	Min. Impact Min. Impact Min. Impact Pstv. Impact	Pot. Impact Pot. Impact Pot Neg Imp
Terr. Res.	No Impact	Min. Impact	Pot. Impact
Wedands Terr. Res.	No Impact	No Impact	Pot. Impact
Cult. Res.	No Impact	No Impact	Pot. Impact Pot. Impact Pot. Impact Pot. Impact
Aqua. Res.	No Impact	Min. Impact	Pot. Impact
Bio. Res.	No Impact	BPreferred* Min. Impact Min. Impact No Impact	Pot. Impact
Alternative	A No Action No Impact	B Preferred*	CAlternate

* Alternative Bhas least Impacts

5. List of Cooperating Agencies and Organizations

- 5.1 Afghanistan National Environmental Protection Agency; Muqvil Kareem (Kabul), Mr. Mohammad Ishaq Hamidsai & Mr. Hagi Ghulam Sakhi (Kunduz Province)
- 5.2 Ministry of Energy and Water; Mr. Saeed Sharif
- 5.3 Ministry of Mines and Industry;
- 5.4 Department of Animal Husbandry and Food Stuffs; Mukhammad Sharif
- 5.5 Ministry of Information, Culture and Tourism; Mr. Omar S. Sultan (Kabul), Mr. Saied Ismail Ansare (Kunduz Province)
- 5.6 Ministry of Public Health; Dr. Aman Hussainy
- 5.7 Afghanistan Investment Support Agency; Dr. Omar Zakhilwal
- 5.8 Kunduz Province Governor; HE Khodzhy Inzhynir Mokhammad Omar
- 5.9 Kunduz Province Deputy Governor; Mr. Sayed Daud Hashimi
- 5.10 University of Kabul:
 - 5.10.1 Department of Biology; Dr. Ahmad Shah Jalal
 - 5.10.2 Department of Geology:
 - 5.10.2.1 Hydrology/Siesmology; Dr. Naim Eqrar
 - 5.10.2.2 Soil Science; Dr. Shegileh
- 5.11 U.S. Agency for International Development:
 - 5.11.1 Program Development; Mr. Abdul Rahim Yahya
 - 5.11.2 Agriculture and Rural Development; Mr. Tracy Atwood
- 5.12 U. S. State Department; William E. Moeller (Kunduz Province)
- 5.13 United Nations Environmental Program (UNEP); Mr. George Bouma
- 5.14 U. S. Geological Survey; Saeed Mirzad

- 5.15 Non Government Organizations:
 - 5.15.1 Save the Environment of Afghanistan (SEA); Mr. Ghulam Mohd Malikyar
 - 5.15.2 Mercy Corps (USNGO)
- 5.16 Land O' Lakes; Dr. Moosa Masody (Kunduz Province)
- 5.17 General Public; Public Meeting in Kunduz Province
- 5.18 Individual Landowners
- 5.19 ECOLOG Waste Management; Mr. Sevri Destani
- 5.20 Mountain Pastures Dairy President; Mr. Alexander Khan
- 5.21 Well Drilling Company; Mr. Mawlawe Naim

6. Organizations Receiving the Environmental Assessment

Land O' Lakes, Inc.

7. Environmental Assessment Preparer:

Dewayne L. Knott, Biologist 28 years experience in Planning & Environmental Management, U. S. EPA

8. Executive Summary

8.1 The site survey and data gathered at the Mountain Pastures Dairy Company plant construction site revealed <u>no significant environmental impacts</u> associated with the project (Appendix B). However, the Environmental Assessment *process* resulted in a <u>significant impact</u> related to the development of open public participation clearly displaying democracy in action. The public meeting held in Kunduz on June 4, 2006 serves as an example for future activities involving this and other decisions that may impact the citizens of Afghanistan. The support of local government officials, village leaders and the National Environmental Protection Agency aided immeasurably in the success of the public meeting...indeed, the actions of these brave leaders were the very foundation and reason for its successful culmination. Comments were solicited from the attendees and there were no comments other than support.

It is significant to note that the majority of solid waste (pallets, cardboard, paper, etc.) will be recycled and reused. Solid material that can not be reclaimed will be contracted for disposal at an offsite approved incinerator. The plant has also incorporated a real-time waste monitoring system that will constantly monitor the condition of the process water and sludge as it is treated and stored for land application or use for animal consumption.

Appendix A

Letter from the Kunduz office of the Ministry of Information, Culture and Tourism to the Kunduz Environmental Protection Department confirming the lack of historical sites in the area around the Mountain Pastures Dairy plant.

Question	Answer
To: Department of Information & Tourism Kunduz Province As we all have information on a Dairy Industry in Obdan dessert which is Owned by Qazaq'a and funded by USAID the land of Industry is Leased by Ministry of Agriculture & Livestock. As we are doing an Environment assessment on mentioned Industry I would like to draw your attention if there is any historical /Mineral aspects in that area please let us know. Regards Mohammad Ishaq Hamidzai Head of Environment Protection Department Kunduz	To: Kunduz Environment Protection Department After assessment Area of Dairy Industry in Obdan dessert it is cleared that the Industry is not in a Historical Area and is also far from tourism hills which should be 100M away from tourism hills and due to luck of information we cant say anything about mines Regards Sayed Ismail Ansare Head Of Information & Tourism Department Kunduz

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APPENDIX B

Letter from the Kunduz Environmental Protection Department to the National Environmental Protection Agency (NEPA) regarding the environmental impact of the Mountain Pastures Dairy plant.

From: Kunduz Environment Protection Department

To: National Environment Protection Agency(NEPA)

Mr. Mohammad Karim Muqbil representative of NEPA who was introduced to Kunduz Environment protection Department by Letter no. 37036 on 10/03/1385 had an environment assessment on a dairy Industry which is owned by Qazaq's and funded by USAID. The land was leased by Ministry of Agriculture & Livestock to them.

After assessment it was cleared that the project doesn't have negative effect on environment and it was welcomed by government officials in a meeting in Governor House and by Local village People.

After Environment assessment Mr. Muqbil was returned to Kabul on 20/03/1385.

Regards
Mohammad Ishaq Hamid Zai
Head of Kunduz Environment Protection

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Appendix C

Finding of No Significant Impact (FONSI)

MOUNTAIN PASTURES DAIRY COMPANY KUNDUZ, AFGHANISTAN KUNDUZ PROVINCE

- I. I have reviewed and evaluated the environmental impacts of the alternatives presented for the Mountain Pastures Dairy Company and I have come to the following conclusion:
 - A. NO ACTION: The no action alternative does not meet the objectives stated in the proposal and does not serve the overall public good.
 - B. PREFERRED ALTERNATIVE: The preferred alternative meets all national, provincial and local objectives and is detailed in the Environmental Assessment.
 - C. ALTERNATE LOCATION: The alternate location alternative, while not specific in location, would be challenged to meet the transportation, water availability, dairy farmers, public land, socio-economic, cultural, esthetic, power, and minimal natural resource impacts as met via alternative B.
- II. The environmental consequences on the physical, biological, socio-economic, cultural and engineering design impacts of the alternatives have been evaluated. Several factors were influential in my assessment:
 - A. The No Action alternative, while having no impact on the physical environment, would likewise not serve the health and wellbeing of the general population. Additionally, the economic growth potential of local farmers and the community would not be realized in the no action alternative.
 - B. Endangered and threatened species will not be adversely impacted by the preferred alternative or the no action alternative. The alternate location could potentially impact such species.
 - C. The preferred alternative has been certified to have no impact on known cultural, religious or archeological sites; nor will it have a significant impact on the esthetics of the surrounding area.
 - D. The preferred alternative will have no significant impact on water and air quality. The alternate location alternative has potential to impact water resources.
 - E. There would be no appreciable impact to the plant and animal life at the preferred alternative site. The action would not cause desertification. The potential exists for

greater impacts to occur to biological, terrestrial and landscape categories in selecting the alternate location alternative.

III. Based on the disclosure of the alternatives' impacts, or potential impacts (positive and negative) contained within the Environmental Assessment, no significant impacts to the environment are anticipated in the preferred alternative. To the contrary, there are significant positive health and economic related impacts in a province that is working hard to reconstruct. The project has been coordinated with the appropriate ministries, local officials, village leaders, the general public and individual adjacent land owners; and there are no known significant unresolved issues. Therefore, further environmental review is not warranted, unless new information is brought forward. Based on the data and known facts I find the preferred alternative to be the action of choice.

19 Aug 2006

Dewayne L. Knott

APPROVAL OF RECOMMENDED ENVIRONMENTAL ACTIONS:

CLEARANCE:		
Acting Deputy Miss Approvai:	Duy Balle	95/00
	James Ahn	Date
Mission Environmental	Officer	
Approval:	MKan	8/3//04
Team Leader Approval:	Michael Kaiser	$\frac{8}{3}/26$
CONCUENTAL	Librer Stodd Mrd	Date
CONCURRENCE:		
Bureau Environmental		
Officer	Date:	
	John O. Wilson	
	Approved: Disapproved:	
DISTRIBUTION:		

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